

REMARKS

By this amendment, claims 4, 8-9, 20, and 24 have been amended. Claims 1-26 are pending in the application. Applicant reserves the right to pursue the original claims and other claims in this and other applications.

Claims 4, 8-9, 20, and 24 have been amended to correct typographical errors.

Claims 1-3, 6-10, 13-17, 20-23, and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. (EP-1050991) in view of Ahvenainen (US 6,199,161). This rejection is respectfully traversed. In order to establish a *prima facie* case of obviousness “the prior art reference (or references when combined) must teach or suggest all the claim limitations.” M.P.E.P. §2142. Neither Roche et al. nor Ahvenainen, even when considered in combination, teach or suggest all limitations of independent claims 1, 8, 15, 17, or 20.

Claim 1 recites a method of updating an encryption key in a wireless network comprising, *inter alia*, “physically separating a communication device containing an encryption key from a wireless station of said network; physically connecting said removed communications device to a wired portion of said network which contains an encryption key generator; replacing an existing encryption key in said communications device with a new encryption key from said generator using a communication over said wired portion of said network” (emphasis added). As noted in the Office Action, “Roche does not explicitly disclose physically separating and connecting a communication device and a wired and wireless network.” Page 3, ln. 15-16.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system, and it is thereafter used in

internal computing in the authentication center and the subscriber identity module, such as a SIM card.” Col. 7, ln. 10-15 (emphasis added). Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to be known by the mobile communication system and stored permanently in its database.” Col. 8, ln. 63-65 (emphasis added). Ahvenainen does not teach replacing an existing encryption key in said communications device with a new encryption key from said generator as recited in claim 1. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 1, claim 1 is not obvious over the cited references.

Claim 8 recites a wireless network comprising, *inter alia*, “a wireless network communications device containing an encryption key, ... being physically disconnectable from said wireless station and physically connectable to said wired network to receive and store as a new encryption key, an encryption key transmitted over said wired network by said wired network communications device” (emphasis added). As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, “Roche does not explicitly disclose a wireless network communications device being physically disconnectable from said wireless station and physically connectable to said wired network to receive and store as a new encryption key.” Page 5, ln. 16-18.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to ... the mobile communication system and stored permanently in its database.” Col. 8, ln. 63-65 (emphasis added).

Ahvenainen does not teach a wireless network communications device containing an encryption key which can receive and store a new encryption key as recited in claim 8. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 8, claim 8 is not obvious over the cited references.

Claim 15 recites a wireless network wireless station comprising, *inter alia*, a “wireless network communications device ... storing an updateable encryption key used in conducting encrypted wireless communications, ... being physically connectable to a wired network to receive and store a new encryption key” (emphasis added). As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, “Roche does not explicitly disclose a wireless network communications device being physically disconnectable from said wireless station and physically connectable to said wired network to receive and store as a new encryption key.” Page 5, ln. 16-18.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to ... the mobile communication system and stored permanently in its database.” Col. 8, ln. 63-65 (emphasis added). Ahvenainen does not teach a wireless network communications device storing an updateable encryption key being physically connectable to a wired network to receive and store a new encryption key as recited in claim 15. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or

suggest all of the limitations of claim 15, claim 15 is not obvious over the cited references.

Claim 17 recites a wireless network communications device comprising, *inter alia*, “a storage area on said network card which stores an updateable encryption key for use in conducting encrypted wireless network communications, said encryption key being updateable when said card is physically connected to a wired network card interface which supplies a new encryption key” (emphasis added). As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, “Roche does not explicitly disclose a removable wireless communications network card adapted to be physically connected to a wireless station card interface.” Page 7, ln. 18-19.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to ... the mobile communication system and stored permanently in its database.” Col. 8, ln. 63-65 (emphasis added). Ahvenainen does not teach a storage area on said network card which stores an updateable encryption key as recited in claim 17. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 17, claim 17 is not obvious over the cited references.

Claim 20, as amended, recites an encryption key programming system comprising, *inter alia*, “an encryption key generator ...; and a programming device ... for receiving over a wire connection an encryption key from said generator, said programming device being adapted to physically receive a wireless network

communications device containing an updatable encryption key and storing said received encryption key in said wireless network communications device” (emphasis added). As discussed above regarding the patentability of claim 1, neither Roche et al. nor Ahvenainen teach or suggest these limitations. As noted in the Office Action, “Roche does not explicitly disclose adapted to physically receive a wireless network communication device.” Page 8, ln. 17-18.

Nor does Ahvenainen teach or suggest these limitations. Ahvenainen teaches that “[t]he key is only entered once both into the subscriber identity module and the authentication center of the mobile communication system.” Col. 7, ln. 10-13 (emphasis added). Ahvenainen further teaches “identifier 202 of the invention is on a SIM card 101.” Col. 8, ln. 56-57. “[S]aid identifier is transferred to ... the mobile communication system and stored permanently in its database.” Col. 8, ln. 63-65 (emphasis added). Ahvenainen does not teach programming device being adapted to physically receive a wireless network communications device containing an updatable encryption key and storing said received encryption key in said wireless network communications device as recited in claim 20. Thus, Ahvenainen does not remedy the deficiency of Roche et al. Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claim 20, claim 20 is not obvious over the cited references.

Since Roche et al. and Ahvenainen do not teach or suggest all of the limitations of claims 1, 8, 15, 17, and 20, claims 1, 8, 15, 17, and 20 are not obvious over the cited references. Claims 2-3 and 6-7 depend from claim 1 and are patentable at least for the reasons mentioned above. Claims 9-10 and 13-14 depend from claim 8 and are patentable at least for the reasons mentioned above. Claim 16 depends from claim 15 and is patentable at least for the reasons mentioned above. Claims 21-23 and 26 depend from claim 20 and are patentable at least for the reasons mentioned above. Applicants

respectfully request that the 35 U.S.C. § 103(a) rejection of claims 1-3, 6-10, 13-17, 20-23, and 26 be withdrawn.

Claims 4-5, 11-12, and 24-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. in view of Ahvenainen, and further in view of Trieger (US 6,226,750). This rejection is respectfully traversed. Claims 4-5 depend from claim 1 and are patentable at least for the reasons mentioned above. Claims 11-12 depend from claim 8 and are patentable at least for the reasons mentioned above. Claims 24-25 depend from claim 20 and are patentable at least for the reasons mentioned above. Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of claims 4-5, 11-12, and 24-25 be withdrawn.

Claims 18-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Roche et al. in view of Ahvenainen, and further in view of Serecki et al. (US 2003/0078072). This rejection is respectfully traversed. Claims 18-19 depend from claim 17 and are patentable at least for the reasons mentioned above. Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of claims 18-19 be withdrawn.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Dated: December 16, 2005

Respectfully submitted,

By 

Thomas J. D'Amico

Registration No.: 28,371

Rachael Lea Leventhal

Registration No.: 54,266

DICKSTEIN SHAPIRO MORIN &
OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorneys for Applicant